

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

TASHIA TAYLOR,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-cv-243 TCK FHM
)	
RIVERSIDE BEHAVIORAL HEALTH,)	Judge Terence Kern
MIKE KISTLER, and)	
MARGARET KOCH,)	
)	
Defendants.)	

DEFENDANTS' WITNESS LIST

Pursuant to Fed. R. Civ. P. 26(a)(3), Defendants Riverside Behavioral Health, Mike Kistler, and Margaret Koch (collectively, "Defendants") submit the following witness list.

I. WITNESS LIST

A. Defendants expect to offer the following witnesses at trial:

1. Tashia Taylor.
2. Mike Kistler, Chief Executive Officer, Shadow Mountain Behavioral Health System, 6262 S. Sheridan, Tulsa, OK 74133. 918-492-8200. This individual should be contacted only through counsel for Defendants.
3. Duane Harris, Director of Human Resources, Shadow Mountain Behavioral Health System, 6262 S. Sheridan, Tulsa, OK 74133. 918-492-8200. This individual should be contacted only through counsel for Defendants.

4. Jordan Cooke, Director of Human Resources, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

5. Margaret Koch, Therapist, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

6. Dr. David Goodgame, Clinical Director, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

7. Stacy Bonham, Director of Operations, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. This individual should be contacted only through counsel for Defendants.

B. Defendants may offer the following witnesses at trial if the need arises:

8. Jamie Stone, MHT, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

9. April Burgin, MHT, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

10. Chris Fields, former MHT, **[REDACTED]**.¹

¹ Defendants have redacted certain personal identifiers, including home addresses and phone numbers, of witnesses from the filed copy of this witness and exhibit list. An unredacted copy will be provided to Plaintiff by U.S. mail.

11. Krista Roseborough, Utilization Review Coordinator. Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

12. Amanda Woods, MHT, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

13. Monica Wilcox, former MHT, **[REDACTED]**.

14. Grey McKellar, Program Director, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

15. Dr. Dion Owens, Psychiatrist, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

16. Kristen Ray, former Nurse, **[REDACTED]**.

17. Judith Rager, former TPS Teacher. Ms. Rager's contact information is currently unknown.

18. Bobby Johnson, MHT, Riverside Behavioral Health, 1013 E. 66th Place, Tulsa, OK 74136. 918-293-2500. This individual should be contacted only through counsel for Defendants.

19. Belinda Southard, former MHT, **[REDACTED]**.

20. Tyrone Streeter, former MHT, Riverside Behavioral Health, 3711 S. Indianapolis, Tulsa, OK 74135.

21. Witnesses necessary for rebuttal and/or impeachment.
22. Those witnesses listed on Plaintiff's witness list.

II. EXHIBIT LIST

A. Defendants expect to use the following exhibits at trial:

1. Mandatory Training Requirements.
2. Psychiatric Solutions Safety Policy.
3. Employee Agreement to Report Abuse, Neglect, and Mistreatment or Concerns Regarding Quality of Care.
4. Patient Supervision Guidelines Acknowledgment.
5. 2008 Mandatory Annual Training form.
6. Satori Competency Assessments for 2007 and 2008.
7. Abuse and Neglect Written Exam dated January 5, 2009.
8. Employee Agreement to Report Abuse and Neglect dated January 5, 2009.
9. Patient Grievances regarding Plaintiff.
10. Performance Evaluation and Competency Assessment dated July 31, 2008.
11. Office of Client Advocacy Investigative Reports regarding Plaintiff.
12. Department of Human Services Caretaker Conduct Review Reports regarding Plaintiff.
13. Event Record dated April 23, 2009.
14. Jordan Cooke investigation report dated April 16, 2009.

15. Investigation Summary regarding allegations a therapist helped a patient write a grievance.

16. Witness Statements regarding allegations a therapist helped a patient write a grievance.

17. Risk Management – Incident Reporting dated March 27, 2009.

18. Plaintiff's Facebook posting regarding the Satori method.

19. Investigation Summary regarding alleged racially charged comments.

20. Witness Statements regarding alleged racially charged comments.

21. Email from Dr. David Goodgame dated May 4, 2009.

22. Email from Jordan Cooke dated May 4, 2009.

23. Riverside Behavioral Health Systems Abuse & Neglect Policy.

24. Riverside Behavioral Health Systems Discipline Policy.

25. Termination Letter dated May 6, 2009.

B. Defendants may use the following exhibits at trial if the need arises:

26. Shadow Mountain Behavioral Health Orientation Verification.

27. Employee Handbook.

28. Employee Handbook Understanding By Employee.

29. Shadow Mountain Behavioral Health Systems Pre-employment Considerations.

30. Confidentiality and Protected Health Information Agreement dated July 9, 2007.

31. Transfer Request dated November 5, 2007.

32. Mental Health Technician Job Description.
33. Any exhibits to depositions taken in this matter.
34. Defendants reserve the right to introduce any exhibit listed by Plaintiff and to introduce any exhibit necessary for rebuttal or impeachment.

s/ Tyson D. Schwerdtfeger
Tyson D. Schwerdtfeger, OBA No. 19566
GABLEGOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, Oklahoma 74103-4217
(918) 595-4800 (Telephone)
tschwerdtfeger@gablelaw.com

-and-

Mark W. Peters, Tenn. Bar No. 18422
William T. Fiala, Tenn. Bar No. 22788
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
(615) 244-6380 (Telephone)
mark.peters@wallerlaw.com
bill.fiala@wallerlaw.com

***Attorneys for Riverside Behavioral
Health, Mike Kistler, and Margaret Koch***

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, to:

Tashia Taylor
10804 E. 15th Street
Tulsa, OK 74128

on this 10th day of March, 2011.

s/ Tyson D. Schwerdtfeger